

National Transportation Safety Board

Office of Railroad, Pipeline and Hazardous Materials

Washington, DC 20594



RRD25FR006

OPERATIONS GROUP

Group Chair's Factual Report

November 5, 2025

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A. ACCIDENT DATA

Accident No: RRD25FR006
Type: Fire and Evacuation
Location: Crum Lynne
Date: 2/6/2025
Time: 5:56 p.m. (local time zone)
Carrier: SEPTA
Train: 3223 South

B. OPERATIONS GROUP

IIC & Operations Group Chair	Michael Bachmeier National Transportation Safety Board (NTSB) Investigator-in-charge & Operations Group Chair
Track & Operations Group Chair	Todd Kraholik National Transportation Safety Board (NTSB) Track & Operations Group Chair
Party Coordinator	Brad Okoniewski Chief Safety Officer SEPTA
Party Coordinator	Josh Quillen Operations Inspector Federal Railroad Administration (FRA)
Party Coordinator	Lonnie Swigert Safety Task Force Brotherhood of Locomotive Engineers and Trainman (BLET)
Party Coordinator	Gregory Moss National Safety Team International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART-TD)

C. ACCIDENT SUMMARY

See docket for full description of accident.¹

D. DETAILS OF THE INVESTIGATION



Figure 1: Photo of Train 3223's lead car (MU132). (Source-SEPTA)

1.0 SEPTA

SEPTA (Southeastern Pennsylvania Transportation Authority) is one of the largest transit systems in the country. SEPTA supports five counties in the Greater Philadelphia area. They also connect to transit systems in Delaware and New Jersey. Their services include regional rail, buses, trolleys, subways, and a high-speed line.

SEPTA moves the Southeastern Pennsylvania region forward by providing safe, reliable, and accessible mobility choices for everyone. SEPTA supports equity and

¹ The summary is in the docket:

enhance quality of life by connecting people with opportunity, catalyzing the economy and sustaining our environment.



Figure 2: Map of SEPTA Train System

E. RIDLEY PARK, PA 1ST FIRE - FEBRUARY 6, 2025, - TRAIN 3223

2.0 Events prior to the accident (Train 3223)

There were two crews that operated this train prior to the fire at Crum Lynne station. The train originated out of Powelton Yard earlier that afternoon.

2.1 Run 404

Run 404 went on duty in Powelton Yard at 5:52 a.m. and consisted of an engineer and a conductor. Each crew member had the required rest before reporting to duty. Run 404 was assigned Train 303 from West Trenton Yard to Suburban and then onto 30th St. before taking a morning break at around 8:23 a.m.

Run 404 would report back at 12:56 p.m. at Powelton Yard to take Train 6324 with 6 cars (MU 288 Lead Car) from Powelton to West Trenton. At West Trenton, they would change ends, and Train 6324 would now become Train 3223 for the southbound move with MU 132 as the lead car.

Train 3223 departed West Trenton at approximately 3:16 p.m. (2 minutes late per the schedule).

2.2 Run 462

Run 462 went on duty at 2:10 p.m. at Lenni Yard and consisted of an engineer, conductor, assistant conductor, and a conductor trainee. All members of the crew had the required rest before reporting to duty. Run 462 was assigned to operate Train 3224 from Lenni to Media, then into Suburban Station on their first trip of their day. Run 462's next trip would be to take Train 3223 at Suburban Station from Run 404.

Train 3223 was approximately 25 minutes late than the schedule at Suburban Station when Run 404 and Run 462 swapped crews. Run 462 departed Suburban Station at approximately 4:55 p.m. At approximately 5:56 p.m. the fire incident occurred at Crum Lynne Station as the train was departing in a southbound direction towards Newark.

3.0 Human Performance Summary of Events

The Ridley Park incident on February 6, 2025, involved several SEPTA employees at various points in time before the fire event occurred. NTSB investigators reviewed the actions of these employees to understand the evolution of this incident scenario. Run 404 started with Train number 3223 at West Trenton and Run 462 relieved them at Suburban Station.

Run 404 engineer stated to NTSB investigators that the train was not running well; it was sluggish and took a while to get to track speed.² The train departed West Trenton at about 3:16 p.m. headed southward towards Newark, DE. The engineer stated to NTSB investigators that the train became more sluggish, and he reported its poor performance to a SEPTA dispatcher because the train was headed to Amtrak territory with higher track speeds (i.e., 90 mph vs. 70 mph).³

As the train continued south, it stopped at Bethayers station to pick up an ADA passenger, who was a regular weekly rider. The engineer told NTSB investigators that he began to smell an unfamiliar odor in the operating cab at Bethayers station.⁴ After loading the ADA passenger and continuing the transit, the engineer called the SEPTA dispatcher again to ask about plans for the sluggish train equipment. The dispatcher had to call the engineer back to convey that a mechanical inspection would be performed at the "hole in the fence".⁵

At the hole in the fence, the engineer stopped the train to onboard the mechanical inspection team, which consisted of a Maintenance Manager and two electricians. When the inspection team boarded the head-end, the engineer asked them about the unfamiliar but prominent odor. The Maintenance Manager suggested it may be the smell of a chemical cleaner from SEPTA's work to deep clean the railcars, then he hastily proceeded into the railcars with the two other inspectors to check the performance fault indicator panels (FP&I panels). This was the only interaction the engineer had with the mechanical inspection team.

The Maintenance Manager told NTSB investigators that he received the call at 4:08 p.m. to meet the train at the hole in the fence at 4:12 p.m. from the Supervisor of Train Operations (STO).⁶ The Maintenance Manager further said that he usually has about 30 minutes notice prior to an inspection to review the maintenance logs for a railcar, but the 4 minute notice for this inspection did not allow him to do any preparation.⁷ Nevertheless, the Mechanical Inspection team walked through the six railcars and found three of them as bad orders. The mechanical inspectors also noted the unusual odor in the railcars, but they could not agree amongst themselves on the source of the smell.⁸ The train conductor told NTSB investigators that the Maintenance Manager said the odor was from a bad motor.⁹ Based on the three

² Interview transcript of Charles McClain, dated February 8, 2025, page 7, lines 2-4.

³ Interview transcript of Charles McClain, dated February 8, 2025, page 7, lines 10-12.

⁴ Interview transcript of Charles McClain, dated February 8, 2025, page 7, lines 13-15.

⁵ "Hole in the fence" is SEPTA jargon for a location in Rogers Yard where technicians and inspectors can access the trains.

⁶ Interview transcript of Jerome Fletcher, dated February 8, 2025, page 7, lines 2-5.

⁷ Interview transcript of Jerome Fletcher, dated February 8, 2025, page 11, lines 5-13.

⁸ Interview transcript of Jerome Fletcher, dated February 8, 2025, page 12, lines 1-10.

⁹ Interview transcript of Jason Curbison, dated February 8, 2025, page 7, lines 13-16

railcars not working properly and with consideration of the odor throughout the train, the Maintenance Manager concluded that the equipment should be swapped out.¹⁰

At the conclusion of the mechanical inspection, the Maintenance Manager told NTSB investigators that he telephoned the STO to inform him to “totally swap it out”; meaning, to replace the train equipment.¹¹ In response to the Maintenance Manager, the STO reportedly said “we didn’t have nothing”; meaning, there was no replacement equipment available at that time.¹² The STO also reportedly said that the train was headed towards Wilmington and returning to Powelton Yard later that night, suggesting it could be shopped there for repairs then. The Maintenance Manager told NTSB investigators that he “just said okay, and that was it.”¹³

When asked about the telephone conversation with the Maintenance Manager, the STO told NTSB investigators that,

“It was never relayed to me that there was any other issues other than three dead cars. So, I’m like, okay, three out of six running, you know, unless they say otherwise, the guys are clear.”¹⁴

NTSB investigators reviewed the recorded telephone conversation between the Maintenance Manager (MM) and STO, which lasted about 38 seconds.¹⁵ Key portions of the conversation follow:

STO: This is Andre

MM: Hey, Andre. This is RROCC Mechanical. We’re looking at that trainset on 3 track.

STO: Yes, sir.

MM: Three out of the three cars is bad. 131, 132, and the 288. That’s what is causing the slow acceleration.

STO: Alright. Awh. Okay. It’s going down to Wilmington. There really isn’t nothing we can do now. But it goes back to Powelton tonight

MM: Okay.

STO: Alright.

After the telephone call to the STO, the mechanical inspection team started to depart the train through the last car without discussing the situation with the train crew. The conductor stopped them and asked about their findings from the inspection.¹⁶ The conductor was told the train had three bad cars and a bad motor. The conductor then asked the mechanical inspection team if the train could be

¹⁰ Interview transcript of Jerome Fletcher, dated February 8, 2025, page 12, lines 12-13.

¹¹ Interview transcript of Jerome Fletcher, dated February 8, 2025, page 15, lines 18-19.

¹² Interview transcript of Jerome Fletcher, dated February 8, 2025, page 15, line 21.

¹³ Interview transcript of Jerome Fletcher, dated February 8, 2025, page 16, line 14.

¹⁴ Interview transcript of Andre Tate, dated February 8, 2025, page 7, lines 8-10.

¹⁵ Audio recording of telephone conversation between RROCC Mechanical and STO, timed stamped at 16:31:03 on February 6, 2024.

¹⁶ Interview transcript of Jason Curbison, dated February 8, 2025, page 8, lines 2-5.

moved or if it needed to be shopped for repairs. The conductor was told by the mechanical inspection team that he needed to contact the dispatcher to find out what to do next. The mechanical inspection team then left the train.

The conductor returned to the head-end to brief the engineer and assistant conductor about the mechanical inspection. The conductor indicated to the engineer and assistant conductor that the inspectors were off the train, and then he conveyed their inspection findings. The engineer called the dispatcher and informed them that the mechanics had found three bad cars and a bad motor.¹⁷ The dispatcher replied by asking if the train was moving yet. The conductor told NTSB investigators that the train crew was surprised by this question because the engineer had informed the dispatcher of the train problems, but they responded that they could move.¹⁸

The engineer called back to the SEPTA dispatcher to confirm the train movement, asking "Ok to proceed South?"¹⁹ The dispatcher confirmed, saying "Yes, proceed South." The dispatcher then asked the train crew, "...are we moving, are we on the move or are we, you know, what are we doing."²⁰ The engineer responded, "we're on the move." The dispatcher confirmed, saying "it's a roger, you're on the move." The train crew began to travel to Suburban Station.

At Suburban Station, the train was handed off to the Run 462 crew consisting of an engineer, conductor, assistant conductor, and a conductor trainee. The two engineers had a face-to-face briefing, where the Run 462 engineer was informed about the three dead cars and that the train had a mechanical inspection at Roberts Yard. Run 462 engineer also was told that nothing could be done with the equipment and that the STO wanted the train taken through to its destination.²¹ Run 462 engineer told NTSB investigators that he and his crew knew something was not right before talking with the arriving crew because they could smell the odor as the train pulled into Suburban Station.²²

The run 462 engineer accepted the train and began their transit south to Wilmington, stopping first at 30th Street Station. During this stop, the chief dispatcher radioed the train crew to inquire about their time at the station. The engineer explained that they had to unload the ADA passenger. The engineer also informed the chief dispatcher that the smell of the equipment was getting worse at the head-

¹⁷ Interview transcript of Jason Curbison, dated February 8, 2025, page 8, lines 13-15. Audio recording timestamp at 16:31:03.

¹⁸ Interview transcript of Jason Curbison, dated February 8, 2025, page 28, lines 14-17.

¹⁹ NTSB Operation Group Chair's Field Notes, dated February 10, 2025, page 10, Audio recording timestamp 16:35:45.

²⁰ Interview transcript of Jason Curbison, dated February 8, 2025, page 9, lines 3-5.

²¹ Interview transcript of Brandon Mosley, dated February 8, 2025, page 7, lines 4-13.

²² Interview transcript of Brandon Mosley, dated February 8, 2025, page 7, lines 14-18.

end. The engineer told NTSB investigators that the chief dispatcher disregarded that information.²³

As the train continued its transit southward, the engineer told NTSB investigators that it continued to perform sluggishly. After passing Penn Medicine Station, a following train called to Run 462 to ask why they were going so slow. Run 462 answered, "because this equipment's bad."²⁴

When the train reached Crum Lynne, the engineer noticed some haze when he looked back along the train. The assistant conductor informed the engineer a few times that the smell was getting worse in the railcars. The engineer decided that he needed to inspect the equipment but needed to get to a station with enough space to see the train, such as Eddystone Station. Additionally, the engineer and conductor decided to move the passengers out of the first railcar into the second railcar, since the smell was strongest in the first car.

After departing Crum Lynne station heading toward Eddystone, the engineer was focused on getting to the next station to look at the train equipment²⁵. The engineer and conductor decided to drop the pantograph on the first passenger railcar because the odor was strong. They also moved the passengers out of the first two railcars. But, before they reached Eddystone station (about two catenary poles before the signal at Baldwin), the engineer saw a plume of smoke when he looked back along the train. He stopped the train and contacted Amtrak CTEC 4 to inform them that the train, particularly the lead MU, was smoking. Then, the engineer got on the ground and saw that the train was on fire. He returned to the operating cab to radio the conductor that the train was on fire and to instruct him to evacuate the passengers through the rear railcar. Before the passengers exited, they waited for Amtrak CTEC to protect the track.

4.0 Train 3223 Crew Information

4.1 Run 462 (Incident Crew) - On duty 2:10 p.m. (local time)

- Run 462 out of Lenni Yard starts at 2:10pm
- Finishes at Lenni Yard at 1:36am

Engineer Mosley

Septa Hire date 9/25/2006.

Qualified Locomotive Engineer - 2/19/2008

Railroad C&E Annual training class 2/1/24

²³ Interview transcript of Brandon Mosley, dated February 8, 2025, page 8, lines 8-12.

²⁴ Interview transcript of Brandon Mosley, dated February 8, 2025, page 8, lines 17-18.

²⁵ Interview transcript of Brandon Mosley, dated February 8, 2025, page 10, lines 3-4.

Emergency preparedness 9/25/24

Conductor Latigona

Septa Hire Date 12/1/1997.

Qualified Conductor 2/28/2002

Railroad C&E Annual recertification class 9/25/24

Emergency preparedness 9/25/24

Assistant Conductor Montgomery

Septa Hire Date 7/8/24.

Assistant Conductor qualifications 8/5/24

Emergency Preparedness Training 8/1/24

Assistant Conductor (new hire OJT)

Septa Hire Date 12/2/24.

Assistant Conductor Qualification 12/30/24

Emergency Preparedness Training 12/30/24

4.2 Run 404 - On duty 5:52 a.m.

- Run 404 out of West Trenton Yard at 5:52am
- Finishes at West Trenton Yard at 7:28pm

Engineer McClain

Septa Hire date 8/29/1990.

Qualified Locomotive Engineer - 7/22/1994

Railroad C&E Annual training class: 2/29/2024

Emergency preparedness: 2/29/2024

Conductor Curbison

Septa Hire Date 2/6/2023.

Qualified Conductor 8/30/2024

Conductor certification began: 8/30/2024.

Emergency preparedness: 8/30/2024

5.0 Territory and Train Movements - Amtrak PW Subdivision

The PW Line extends from Zoo (Philadelphia) at MP 0.0 on the north end of the subdivision to CP Avenue (Washington Terminal) at MP 134.6 on the south end of the subdivision. The fire and evacuation happened at MP 11.5 in Crum Lynne. The PW Line has multiple main tracks for the extent of the subdivision. Maximum authorized speed is 135 mph for passenger trains along the subdivision. The maximum speed for passenger trains at the accident location is 105 mph. Train movement is governed

by NORAC operating rules, special instructions, timetable instructions, and signal indication coordinated by Amtrak dispatchers in Wilmington, Delaware. At the accident location, NORAC rule 261 governs the signals with Advanced Civil Speed Enforcement System (ACSES) in place as the Positive Train Control (PTC) safety overlay.

PW Subdivision is Amtrak Territory. SEPTA dispatching control ends once trains pass through Arsenal (MP 2.7, PW).

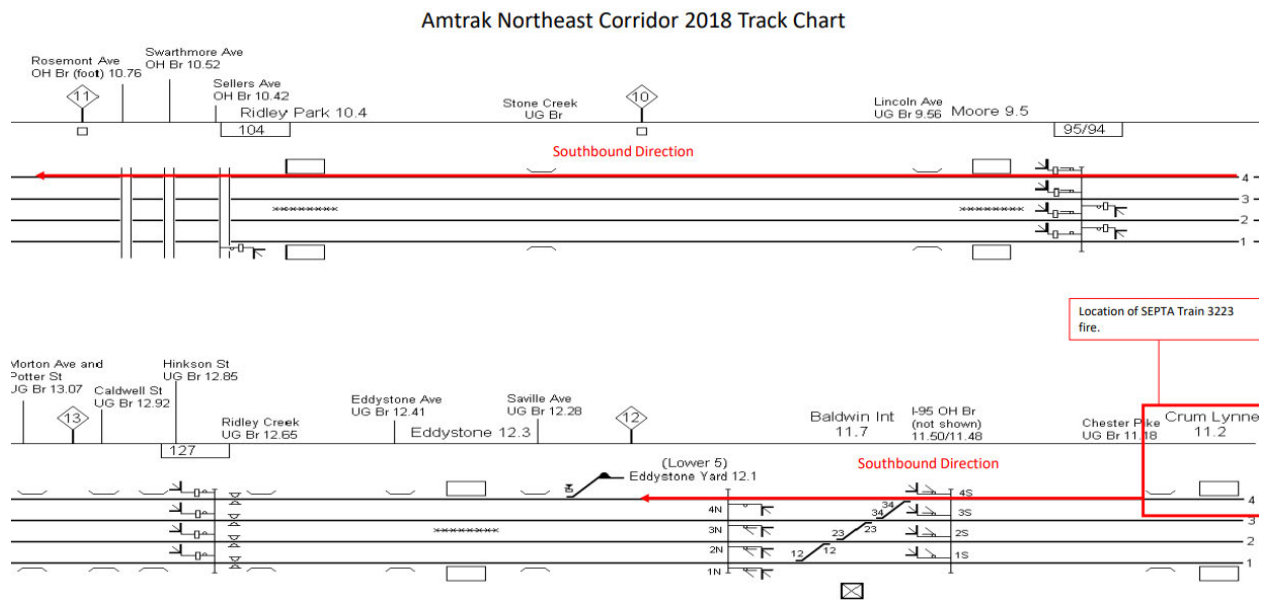


Figure 3. Current Amtrak Northeast track chart - PW Subdivision at MP 11.5

6.0 Dispatcher Recordings

The investigative team reviewed the RROCC recordings and Amtrak recordings between the Dispatcher, Train 3223, and mechanical team.

There are multiple Dispatchers that the train spoke to on the north end of Train No. 3223's trip. Between 15:50 and 16:08, the train spoke to the Dispatcher on Desk 2 (SEPTA 2), and between 16:26 and 16:35, the train spoke to the dispatcher on Desk 3 (SEPTA 3). Between 17:48 and 17:58, the train spoke to the Amtrak dispatcher on CETC-4 desk.

Recordings Timeline

15:50 Engineer McClain reports to the dispatcher that the power is sluggish and will not get up to speed. He stated that it is not going to do what it needs to on Amtrak. Dispatcher asked about any fault lights. Yes, we do. The Dispatcher misheard and said

no fault lights. The Engineer stated negative; we do have a fault light. (There is only one general fault light on this equipment)

16:00 The Engineer called Dispatch and asked if there were any plans for the equipment.

16:01:11 The Dispatcher told the Engineer I will get back to you, all the chiefs are in a big powwow right now.

16:08:53 Dispatcher told the 3223 Engineer that mechanical will meet you at the hole in the fence.

16:19 Telephone call from Rock Mechanical to the Chief Dispatcher. We are here where are they? They just knocked down Wayne Electric and should be there shortly. He is on track 3.

16:26:13 Dispatcher calls for 3223.

16:26:35 Dispatcher calls for 3223.

16:26:43 Dispatcher calls the 3223. How's mechanical doing on that train? They are walking through the train right now. There is an odor in my cab and the first car. What type of odor?

16:28:39 Dispatcher comes back and stated she was having radio issues. She asked about the odor again. They are checking it out now. They said that it was possibly cleaning products, but it smells like something burning. I do not know; they're checking it out now.

16:31:03 This is Andre. This is RROCC Mechanical, we have three bad cars the 131,132, and 288. That is what is causing the slow acceleration. STO said OK there is nothing we can do now. It is going to Wilmington and coming back to Powelton Yard tonight. Mechanical said OK.

16:34:36 Engineer to Dispatcher. Mechanical just got off the train. They said we have three bad cars and a bad motor. Just want to see what we are doing? OK, are you on the move now? (Laughing) We can.

16:35:20 Dispatcher. I thought you were on the move.

16:35:45 3223 to SEPTA 3 ok to proceed South? Yes, proceed South.

17:07:29 Chief Dispatcher to 3223. Is everything ok at 30th Street. Yes, we had an ADA passenger to unload, and the bridge was at the center of the platform, so we had to move it and put it back. OK, next time let us know, we could have run a train around you. The Engineer reported that the traction motor is burning up and the odor smells really bad. Which Car? The lead car #132.

17:48:04. 3223 Engineer to Conductor. 3223 Conductor go ahead. I need you to walk up here when we make this stop.

17:48:17 Conductor. Going up there now.

17:56:25 Engineer. I think we're on fire.

17:57:03 Engineer. 3223 Yeah, the 1st car is on fire. 3223 calling Amtrak dispatcher. Drop the Pan on that car.

17:57:48 CETC-4 who is calling. Engineer 3223: Our lead car #132 is on fire. We're just short of the Baldwin Interlocking and we're moving everyone to the rear.

17:58:18 CETC-4: Your 1st car is on fire? Is everyone clear of the train. Yes, right now, we're moving everyone to the rear end to assess the situation.

17:59:26 Train 3223 to CETC-4, middle of the, underneath the first part of 132, there is a fire burning. Dispatcher: Burning under the first car. Engineer: That is a roger. Dispatcher: Should I get the fire department there then. Engineer: Yeah, that's a roger, we may need a fire department. Dispatcher: What is your location. Engineer: Two Cat poles north of Baldwin Interlocking, home signal. Engineer: Just north of Baldwin, roger that.

18:00:48 CETC-4 to 3223, let me know when the fire department arrives, over.

18:01:50 Roger that, Engineer to conductor, evacuate them off the back, the fire is pretty bad at this end, I am going to walk on the ground back to you guys.

18:06:28 Conductor to Engineer: We need protection on 3 track. CETC-4: You want protection, I have a guy approaching on 3 track and once he clears, I will get you protection, over. Engineer to Conductor: Did you copy that; he has to get one by before he can get us protection. Conductor: That's a roger, I copied that. Engineer: Fire department is here; I am going to try to talk to them. Just keeping walking everyone to the rear and getting them off. Conductor: That's a roger.

18:09:21 CETC-4 to 3223: 3223 you got protection on 3-track, from Baldwin to Phil at 6:09 pm, Conductor: Roger that, protection on 3-track from Baldwin to Phil at 6:09 pm.

18:37:54 RROCC Chief (KUC) Hiplink: 3223 evacuated 325 passengers with Ridley Park Police Department on location.

7.0 Event Recorder

The operations working group reviewed the event recorder out of the married pair of the lead car and 2nd car (132-131). There is only one recorder for the married pair, and it was in MU 131.

The team noted that train 3223 departed Crum Lynne station at 5:54:33 and stopped 638 feet south of the station at 5:56:06.

Event #	Time	ATC Aspect		ADU Speed	FWD	REV	Sw	P1	P2	P3	Dyn	Brake Cylinder	BP Charged	F Cab	A Cab	Distance	ATC Penalty	PTC Penalty	Ack	ATC Alarm	Alerter	PTSO	Track #	Line #	Non Cab Territory	ATC Dep.	PTC Dep.	ATC Cutover	PTC Cutover	Car Number
		MAS	AS																											
2301	2025-02-06 17:54:29.860	9	90	0	1	0	1	1	1	1	0	2	1	0	1	48419	0	0	0	0	0	0	4	2	0	2	2	0	0	131
2302	2025-02-06 17:54:30.850	9	90	0	1	0	1	1	1	1	0	2	1	0	1	48419	0	0	0	0	0	0	4	2	0	2	2	0	0	131
2303	2025-02-06 17:54:31.840	9	90	0	1	0	1	1	1	1	0	2	1	0	1	48419	0	0	0	0	0	0	4	2	0	2	2	0	0	131
2304	2025-02-06 17:54:32.830	9	90	0	1	0	1	1	1	1	0	2	1	0	1	48419	0	0	0	0	0	0	4	2	0	2	2	0	0	131
2305	2025-02-06 17:54:33.820	9	90	0	1	0	1	1	1	1	0	2	1	0	1	48419	0	0	0	0	0	0	4	2	0	2	2	0	0	131
2306	2025-02-06 17:54:33.910	9	90	1	1	0	1	1	1	1	0	2	1	0	1	48419	0	0	0	0	0	0	4	2	0	2	2	0	0	131
2307	2025-02-06 17:54:33.910	9	90	1	1	0	1	1	1	1	0	2	1	0	1	48419	0	0	0	0	0	0	4	2	0	2	2	0	0	131
2308	2025-02-06 17:54:34.110	9	90	1	1	0	1	1	1	1	0	2	1	0	1	48420	0	0	0	0	0	0	4	2	0	2	2	0	0	131
2309	2025-02-06 17:54:34.810	9	90	1	1	0	1	1	1	1	0	2	1	0	1	48420	0	0	0	0	0	0	4	2	0	2	2	0	0	131

Figure 4: Train 3223 departing Crum Lynne station.

Event #	Time	ATC Aspect		ADU Speed	FWD	REV	Sw	P1	P2	P3	Dyn	Brake Cylinder	BP Charged	F Cab	A Cab	Distance	ATC Penalty	PTC Penalty	Ack	ATC Alarm	Alerter	PTSO	Track #	Line #	Non Cab Territory	ATC Dep.	PTC Dep.	ATC Cutover	PTC Cutover	Car Number
		MAS	AS																											
3058	2025-02-06 17:56:04.900	9	90	4	1	0	0	0	0	0	1	59	1	0	1	49056	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3059	2025-02-06 17:56:04.900	9	90	4	1	0	0	0	0	0	1	59	1	0	1	49056	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3060	2025-02-06 17:56:05.100	9	90	3	1	0	0	0	0	0	1	59	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3061	2025-02-06 17:56:05.100	9	90	3	1	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3062	2025-02-06 17:56:05.100	9	90	3	1	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3063	2025-02-06 17:56:05.600	9	90	2	1	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3064	2025-02-06 17:56:05.900	9	90	2	1	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3065	2025-02-06 17:56:05.900	9	90	2	1	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3066	2025-02-06 17:56:06.100	9	90	2	1	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3067	2025-02-06 17:56:06.200	9	90	1	0	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3068	2025-02-06 17:56:06.700	9	90	0	0	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131
3069	2025-02-06 17:56:06.700	9	90	0	0	0	0	0	0	0	1	62	1	0	1	49057	0	0	0	0	0	0	4	2	0	2	2	0	0	131

Figure 5: Train 3223 stopped south of Crum Lynne station when lead car started on fire.

8.0 Rail Car Camera Review

The operations working group reviewed the SEPTA outward facing camera and inward facing camera on scene along with the crash worthiness working group.

The summary will be in the crash worthiness factual report which is in the docket.²⁶

²⁶ The factual for crashworthiness working group is in the docket:

9.0 Interviews

The investigative team interviewed Train 3223, Crew 404 and Crew 462, and the Supervisor of Train Operations (STO) on Saturday, February 8, 2025, at SEPTA headquarters.

Please refer to the docket for the full interview transcripts.²⁷

F. OVERSIGHT AND CREW QUALIFICATIONS

Railroads in the US are regulated by the Federal Railroad Administration (FRA). FRA's office of railroad safety promotes and provides external safety oversight of the nation's railroad industry. The staff of the office includes nearly 400 Federal safety inspectors who specialize in one of six technical disciplines focusing on compliance and enforcement in:

- Grade Crossings
- Hazardous Materials
- Motive Power and Equipment
- Operating Practices
- Signal and Train Control
- Track

SEPTA safety oversight is conducted through a written operations testing program developed by each railroad as required in title 49 Code of Federal Regulations (CFR) Section 217.9, Program of Operational Testing, and Inspections. This regulation requires that railroads have a written testing program and periodically conduct operational tests and inspections of their employees. These tests and inspections determine compliance with and reinforce expectations of operating rules, timetables, and special instructions.

SEPTA managers are required to perform efficiency testing on the SEPTA system in accordance with the written program. Review of testing records show that managers performed 713 efficiency tests on the Amtrak Wilmington line ran by SEPTA in the preceding 12 months with 7 of these in the Crum Lynne area.

²⁷ The full interviews are in the docket:

As part of this investigation the operational tests conducted on the crews involved in this incident were reviewed. Employee records reflect the following testing was performed on the involved crews in the preceding 24 months:

Crew 462

- Conductor- 245 tests entered with 242 tests within standard and 3 exceptions.
- Engineer- 441 tests entered with 441 tests within standard and 0 exceptions.
- Assistant Conductor- No tests entered account he is a new employee.

Crew 404

- Conductor- 76 tests entered with 75 tests within standard and 1 exception.
- Engineer- 203 tests entered with 201 tests within standard and 2 exceptions.

The requirements for certification of engineers are contained in title 49 CFR part 240, Qualification and Certification of Locomotive Engineers. Within these requirements there are initial training requirements and recurring training that are needed for an engineer to stay current and qualified. As part of the investigation records were reviewed for the two engineer's pertaining to certification. In accordance with SEPTA rules, the engineer was licensed, qualified, and current to operate on the SEPTA and Amtrak systems.

The requirements for certification of conductors are contained in title 49 CFR part 242, Qualification and Certification of Conductors. Within these requirements there are initial training requirements and recurring training that is needed for a conductor to stay current and qualified. As part of the investigation records were reviewed for the conductor pertaining to certification. In accordance with SEPTA rules, the conductor was licensed, qualified, and current to operate on the SEPTA and Amtrak systems.

G. PAOLI, PA, 3RD FIRE - JULY 22, 2025, - TRAIN 3553

10.0 Details of the Investigation



Figure 6: Photo of Train 3553's fifth car (MU114). (Source-SEPTA)

11.0 Events prior to the accident (Train 3553)

There were two crews that operated this train prior to the fire at Paoli station. The train originated out of West Trenton Yard earlier that evening.

11.1 Run 410

Run 410 went on duty at 3:33 p.m. at West Trenton Yard and consisted of an engineer and a conductor. Each crew member had the required rest before reporting on duty. Run 410 was assigned Train 6345 from West Trenton to Suburban Station and took lunch.

Run 410 would report back for train 5344 with 6 cars (MU 113 lead car) from Suburban Station to West Trenton. At West Trenton, they would change ends and

train 5344 would now become train 3553 for the southbound move with MU 324 as the lead car.

Run 410 Engineer operated this six-car Silverliner IV consist from West Trenton to Suburban Station. They departed West Trenton at 8:00 p.m. (2 minutes late per the schedule) They experienced sluggish acceleration throughout the trip and reported the issue to the dispatcher at Fern Rock. General fault and red/white fault lights were illuminated both northbound and southbound out of West Trenton.

The conductor stated that they experienced sluggish acceleration starting near West Trenton/Yardley. The conductor stated in his interview that he reset the "no power" fault on car 113 twice: once near Yardley and again between Noble and Jenkintown. He also said he reset a fault on the second married pair near Elkins Park. No improvement in performance was noted after resets.

The engineer informed the dispatcher of the issues; dispatcher said they would "turn it in" but did not follow up. They arrived at Suburban Station at approximately 9:06 p.m.

The engineer and conductor of run 410 briefed the crew of run 446 about the equipment condition.

11.1 Run 446

Run 446 went on duty at 12:20pm at Frazer Yard and consisted of an engineer and conductor. All members of the crew had the required rest before reporting on duty. Run 446 was assigned to operate Train 9556 from Frazer to Suburban Station on their first trip of their day. Run 446's last train would be to take Train 3553 from Suburban Station into Frazer Yard, with the last station stop scheduled to be Malvern.

Run 446 received Train 3553 at Suburban Station at around 9:06 p.m. Train 3553 was approximately 5 minutes late at Suburban Station when Run 410 and Run 446 swapped crews. Run 446 departed Suburban Station at approximately 9:10 p.m. The train consisted of six Silverliner IV cars, with no dynamic brakes and sluggish acceleration.

The engineer noted no traction power at Villanova station meaning they had no tractive power to move the train. The HVAC and lighting were functional, but train could not move. Engineer had called up the conductor too show him how to conduct a "no power reset" procedure. The conductor went back to reset faults in the fourth and fifth cars which temporarily restored power. After reset, train regained traction power and train proceeded west.

Upon arrival at Paoli at approximately 10:38 p.m., traction power was again lost. Conductor walked back to reset faults and noticed smoke in the fourth car and later heard a loud boom. The engineer notified Paoli Tower, the crew evacuated passengers, dropped pantographs, and applied handbrakes. Fire occurred shortly after.

The EMS evaluated the conductor for chest tightness and transported him to the hospital.

12.0 Train 3553 Crew Information

12.1 Run 446 (Incident Crew) - On duty 12:20 p.m.

Engineer Cyrus

Septa Hire date: 3/18/19
Qualified Locomotive Engineer: 1/25/24
Railroad C&E Annual training class: 1/8/24
Emergency preparedness: 1/30/24

Conductor Rhodunda

Septa Hire Date 8/5/2019
Qualified Conductor 6/9/2023
Railroad C&E Annual recertification class: 4/24/25
Emergency preparedness: 4/24/25

12.2 Run 410 - On duty 3:33 p.m.

Engineer Bolling

Septa Hire date: 10/10/16
Qualified Locomotive Engineer: 12/3/18
Railroad C&E Annual training class: 11/15/24
Emergency preparedness: 11/15/24

Conductor Smith

Septa Hire Date: 7/20/25
Qualified Conductor: 9/23/19
Railroad C&E Annual recertification class: 2/1/24
Emergency preparedness: 2/1/24

13.0 Territory and Train Movements - Amtrak - Philadelphia to Harrisburg (PH) Subdivision

The PH Line extends from Zoo (Philadelphia) at PM 1.0 on the east end of the subdivision to Division Post (Harrisburg) at MP 105.2 on the west end of the subdivision. The fire and evacuation happened at MP 19.1 in Paoli. The PH Line has multiple main tracks for the extent of the subdivision. Maximum authorized speed is 110 MPH for passenger trains along the subdivision. The maximum speed for passenger trains at the accident location is 65 MPH. Train movement is governed by NORAC operating rules, special instructions, timetable instructions, and signal indication coordinated by Amtrak dispatchers in Wilmington, Delaware. NORAC rule 261 governs the signals with Advanced Civil Speed Enforcement System (ACES) in place as the Positive Train Control (PTC) safety overlay.

PH Subdivision is Amtrak Territory. SEPTA dispatching control ends once trains pass through Zoo (MP 2.3, PH). Run 446 was operating on Amtrak main track #4.

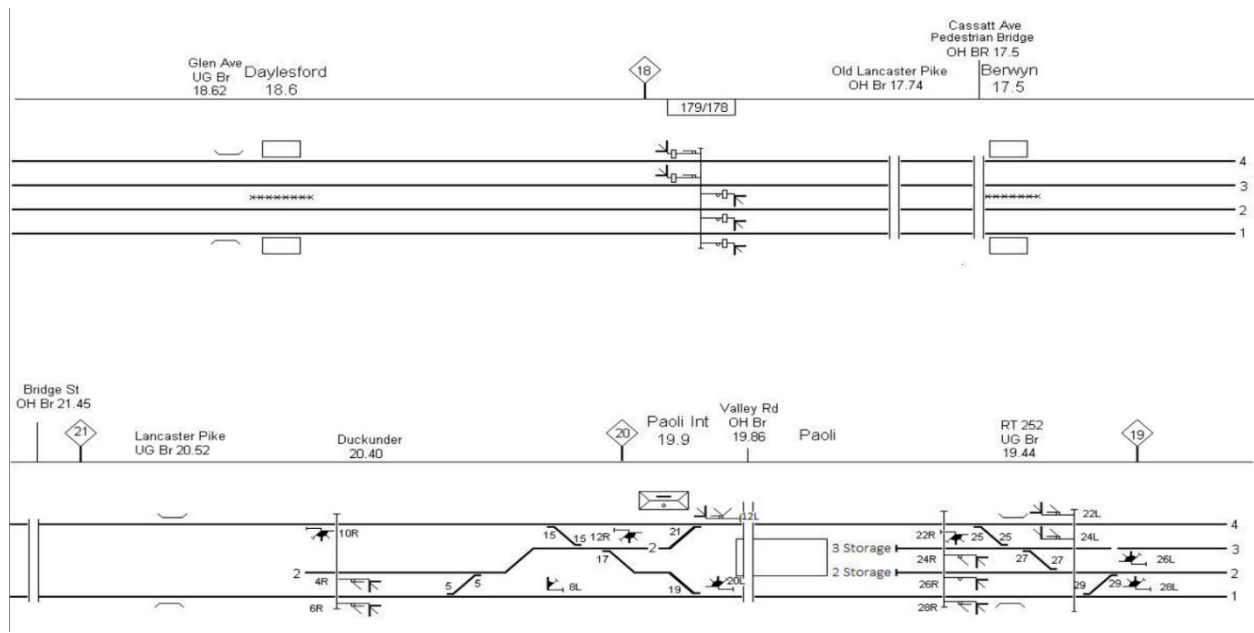


Figure 7. Current Amtrak Northeast track chart - PH Subdivision at MP 19.1

14.0 Dispatcher Recordings

7/22/2025	10:48:41 PM	Paoli Tower	Paoli tower reached 3553 crew and tells them that EMS is notified. Paoli also confirmed there were no crew or passengers on the train. 3553 Engr states the crew is still with the train and asks Paoli is "we need to shut it down and tie it down."
7/22/2025	10:49:26 PM	Paoli Tower	Paoli Tower calls 3553 and instructs them to "shut it down, tie it down, and stay clear of the train."
7/22/2025	10:50:42 PM	Phone call	Phone call between CTEC and STO. CTEC informs STO that smoke is filling the last two cars of the train, there are no passengers on board and EMS is en route. The STO asked if the pantographs were lowered and CTEC could not confirm.
7/22/2025	10:53:15 PM	Paoli Tower	Train 3557 (the train following 3553) Engr reports to Paoli Tower that they are passing something in the gauge that looks like something had been dripping/wetness present in the gauge after 3557 passed the automatic signal at Daylesford.
7/22/2025	10:53:52 PM	Phone call	Phone call from ROCC Mechanical to STO. Mechanical asks if pantographs are dropped. STO stated train "shut it down" but stated he doesn't know what that means and it is still unconfirmed if the pantographs are down.
7/22/2025	10:55:24 PM	Paoli Tower	Severe interference on AMTRAK radio from other activity on the channel. Paoli tower is attempting to confirm if the pantographs are down on train 3553. "Thats a negative" is heard but unknown who said it.
7/22/2025	10:56:25 PM	Paoli Tower	3553 calls Paoli Tower. Cndr states the pantographs are dropped due to the smoke. Paoli Tower confirms the pantographs are dropped.
7/22/2025	10:59:07 PM	Phone call	Phone call from STO to ROCC Mechanical. STO confirms the pantographs are lowered. STO states the issue may be due to a traction motor and also states the ROCC is viewing the train on live video.
7/22/2025	11:00:56 PM	Phone call	Phone call from 3553 Cndr to STO to confirm the crew is off the train. Cndr said he inhaled smoke when he went into the train to put the handbrake(s) on.
7/22/2025	11:03:45 PM	Paoli Tower	AMTRAK Radio Engineering (the liaison between RR OPs and FD Ops) to Paoli Tower to state that the train on No. 4 track (3553) is on fire on the east end. Paoli Tower attempts to make contact with 3553 crew.
7/22/2025	11:07:09 PM	Phone call	Phone call from STO to CTEC. STO confirms no one is on the train and the crew will not answer. STO also confirms with CTEC that the train is on fire.
7/22/2025	11:08:32 PM	Paoli Tower	AMTRAK Radio Engineering to Paoli Tower asking to see if No. 1 and No. 4 tracks are "shut down" (for train movement) at Paoli. Radio Engineering confirms the pantographs on 3553 are down and wants overhead power on No. 1 and No. 4 tracks at Paoli to be off before Fire Department activity commences.

7/22/2025	11:17:29 PM	Phone call	Phone call from ROCC Mechanical to STO. Confirmed pantographs were lowered on train 3553.
7/22/2025	11:24:34 PM	Paoli Tower	Paoli Tower to Radio Engineering to confirm power is off No. 1 and No. 4 tracks at Paoli.

15.0 Video Timeline

Here is a video timeline of events leading up to Paoli station.

Time	Event
21:16:33	Train passes Kay interlocking. No smoke or flame visible "Powelton yard 3.3 30th St Sub station " or 4.4 yard "lead" camera
22:12:40	Depart Villanova station. No noticeable smoke (Passed train 137 @ Villanova and no noticeable smoke or fire)
22:34:53	Possible smoke seen from 113 pantograph camera
22:35:30	Definite smoke seen leaving Daylesford
22:37:16	Bright lights seen reflecting in trees and brush on wayside
22:38:00	Significant smoke starts mostly from left side of train
22:38:22	Arrive at Paoli. Station video shows black smoke and fire from underneath the car when it pulls into the station.
22:42:23	crewmember open rear most door R1 Closest to 114, sees smokes and closes door. walks back into 417 away from 114
22:45:06	last two passengers were told by crew to exit car 325
22:49:18	PLR ground pantograph and causes explosion/arcing
22:55:36	Crew drops pans from cab of 324. overhead is live and arc observed from pan as it's lowered, and interior lights go out.

16.0 Interviews

The investigative team interviewed Train 3553, Crew 446 and Crew 410, the Supervisor of Train Operations (STO), and dispatchers on Tuesday, July 29, 2025, at SEPTA headquarters.

Please refer to the docket for the full interview transcripts.²⁸

H. OVERSIGHT AND CREW QUALIFICATIONS (TRAIN 3553)

Railroads in the US are regulated by the Federal Railroad Administration (FRA). FRA's office of railroad safety promotes and provides external safety oversight of the

²⁸ The full interviews are in the docket: [NTSB Docket - Docket Management System](#)

nation's railroad industry. The staff of the office includes nearly 400 Federal safety inspectors who specialize in one of six technical disciplines focusing on compliance and enforcement in:

- Grade Crossings
- Hazardous Materials
- Motive Power and Equipment
- Operating Practices
- Signal and Train Control
- Track

SEPTA safety oversight is conducted through a written operations testing program developed by each railroad as required in title 49 Code of Federal Regulations (CFR) Section 217.9, Program of Operational Testing, and Inspections. This regulation requires that railroads have a written testing program and periodically conduct operational tests and inspections of their employees. These tests and inspections determine compliance with and reinforce expectations of operating rules, timetables, and special instructions.

SEPTA managers are required to perform efficiency testing on the SEPTA system in accordance with their written program.

As part of this investigation the operational tests conducted on the crews involved in this incident were reviewed. Employee records reflect the following testing was performed on the involved crews in the preceding 12 months:

Crew 446

- Conductor- 135 tests entered with 134 tests passed and 1 failure.
- Engineer- 34 tests entered with 34 tests passed and 0 failures.

Crew 410

- Conductor- 84 tests entered with 82 tests passed and 2 failures.
- Engineer- 108 tests entered with 107 tests passed and 1 failure.

The requirements for certification of engineers are contained in title 49 CFR part 240, Qualification and Certification of Locomotive Engineers. Within these requirements there are initial training requirements and recurring training that are needed for an engineer to stay current and qualified. As part of the investigation records were reviewed for the two engineers pertaining to certification. In

accordance with SEPTA rules, the engineers were licensed, qualified, and current to operate on the SEPTA and Amtrak systems.

The requirements for certification of conductors are contained in title 49 CFR part 242, Qualification and Certification of Conductors. Within these requirements there are initial training requirements and recurring training that is needed for a conductor to stay current and qualified. As part of the investigation records were reviewed for the conductors pertaining to certification. In accordance with SEPTA rules, the conductors were licensed, qualified, and current to operate on the SEPTA and Amtrak systems.

I. GROVERS STATION, PHILADELPHIA, PA, 5TH FIRE - SEPTEMBER 25, 2025, - TRAIN 705

17.0 Summary

On September 25, 2025, SEPTA Train #705 experienced a traction motor fire while arriving at Gravers Station in Philadelphia, Pennsylvania. The incident occurred at approximately 7:05 AM, when smoke was observed coming from the B-end truck of Car #396, the second car in a five-car consist (281, 396, 397, 184, and 183). The crew, consisting of an engineer, conductor, and engineer trainee, reported the fire at 7:12 AM and used a fire extinguisher to subdue it. A post-incident inspection revealed that the #2 traction motor had suffered a catastrophic internal failure, with motor windings separating inside the housing and causing a friction fire. Visual signs of "bird nesting" indicated disintegration of the windings, and both the ground relay (GR) and reset ground relay (RGR) were tripped, disabling motive power and illuminating a fault light in the operating cabin.

The fault light had first appeared on the previous afternoon at 4:44 PM during Train 9755's run, but no crew reported it to dispatch. The train was tied down overnight at Trenton, NJ, and inspected on the morning of September 25 by a car inspector who failed to address the fault light or perform a required Class I brake test. During a follow-up interview with the FRA on September 26, the inspector admitted to disregarding the fault light and skipping the brake test, despite being responsible for preparing trains for early morning commuter service. The train continued operating through multiple routes and crews on September 24 and 25 before the fire occurred.



Figure 8: SEPTA Car 396 Traction Motor



Figure 9: SEPTA Car 396 Traction Motor Close-up

18.0 Details of the Investigation

19.0 Train Crews

Below is a table of all the train crews that were operating the train when car 396 fault light came on and was on during the duration of their trip.

Train Consist Timeline		
Time	Date	Details
Crew #258 Originate SEPTA Train 9755		
15:30:37	9/24/2025	Train 9755 departs Robert's yard toward Trenton, NJ
16:44:42	9/24/2025	Fault light illuminated on operating cabin panels
16:50:19	9/24/2025	Train 9755 terminates at Trenton Transit Center
Crew #258 Originate SEPTA Train 722		
17:04:49	9/24/2025	Train 722 departs from Trenton Transit Center
18:02:08	9/24/2025	Arrival at 30 th Street Station
New Crew #222 Continue SEPTA 722 to Chestnut Hill East		
18:46:43	9/24/2025	Train 722 terminates at Chestnut Hill East Station
Crew #222 Originate SEPTA Train 729		
19:03:32	9/24/2025	Train 729 departs from Chestnut Hill East Station
19:37:26	9/24/2025	Arrival at Suburban Street Station
New Crew #239 Continue to Trenton		
20:34:54	9/24/2025	Train 729 Terminates at Trenton Transit Center
Crew #239 Originate SEPTA Train 730		
21:03:49	9/24/2025	Train 730 departs from Trenton Transit Center
21:57:23	9/24/2025	Arrival at Suburban Street Station
New Crew #414 Continue to Chestnut Hill East		
22:38:55	9/24/2025	Train 730 Terminates at Chestnut Hill East Station
Crew #414 Originate SEPTA Train 737		
23:03:29	9/24/2025	Train 737 departs from Chestnut Hill East Station

00:38:45	9/25/2025	Train 737 Terminates at Trenton Transit Center
Crew Tie Down Consist at Trenton Station Interlocking		
02:16:00	9/25/2025	Inspector set up Blue Flag on SEPTA Car #183
02:24:00	9/25/2025	Inspector removed a Blue Flag on SEPTA Car #183
04:51:00	9/25/2025	Crew #411 came on duty
Crew #411 Originate SEPTA Train 700		
05:00:05	9/25/2024	Train 700 departs Trenton Transit Center
06:30:38	9/25/2025	Train 700 Crew Terminates Chestnut Hill East Station
Crew #411 Originate SEPTA Train 705		
07:01:22	9/25/2025	Train 705 departs Chestnut Hill East Station toward Trenton
07:05	9/25/2025	Train 705 arrives at Gravers Station

The NTSB interviewed the engineer trainee and all the engineers from the trains. They all stated either that they didn't see a fault light or they saw the light and didn't report it because it was a common occurrence.

20.0 MP-11's

On October 7, 2025, SEPTA management told the NTSB that there were no MP-11s put in for car 396 from September 24, 2025, through September 26, 2025.

21.0 Memos

On August 26, 2025, SEPTA issued the Dynamic Brake Light Issues memo.




Southeastern Pennsylvania Transportation Authority

ATTENTION ALL TRAIN CREWS Dynamic Brake Light Issues

During the investigation of our recent train fires by the FRA and NTSB, one of the areas of focus became the dynamic braking system of our Silverliner IV fleet. Out of an overall concern for safety, SEPTA voluntarily began pulling any SL IV car out of service once it experienced the Dynamic Brake Out Light, (DBOL) coming on. This allowed our mechanical department to do extensive testing and maintenance on these vehicles. Thanks to their hard work and effort, we are now at a point where we can modify that position. Train crews are still required to report anytime they see the DBOL light come on but now the train will be allowed to remain in service if it is determined that the DBOL light is acting as intended.

For example, if an engineer is approaching a station, or a braking point and takes a small amount of brake, you may see the DBOL light come on and then light goes out once you apply more braking effort. This is not indicative of any fault, the light is working as intended. Engineers are still required to report this as the information is very valuable to the mechanical department, however, the train will be able to continue in service. If when braking to come to a stop and the DBOL comes on and stays on, you must again report it to the RROC and be given further instructions. Basically, if the light stays on continuously for two station stops, where the track speed is over 30MPH, then the train will be considered to have a dynamic braking issue and RROC mechanical will make the decision whether or not the train will remain in service.

If at any point, you smell smoke in the consist, please notify the RROC immediately regardless of whether you see a DBOL or any other fault in the consist. I want to thank you for your diligence in reporting the issues with the DBOL light and encourage you to continue reporting this and any other mechanical issues you may experience on the equipment. It is vital that we provide the mechanical department with as much information as possible in order to ensure the safety of our fleet. In the next couple of days, Senior Management from Railroad Operations along with Union Leadership from the BLET and SMART 61 will be out to talk to you to explain this change in further detail. Once again, thank you for your efforts and continue to operate safely!


Assistant Chief Officer Railroad Operations

8/26/2025

On September 12, 2025, SEPTA issued the Reporting Defects on MP-11s memo.



ATTENTION ALL TRAIN CREWS Reporting Defects on MP 11's

All crews are reminded anytime they report an issue or defect to the RROC or the mechanical desk, an MP-11 must be filled out. **This applies even in cases where it is determined there is no defect or the issue has been resolved.**

For example, if a crew reports a Dynamic Brake Out Light, contacts the RROC, and speaks to the mechanical desk; if it is determined that the light is acting normally, and the train may remain in service, **the crew is still required to fill out an MP 11.**

If the crew reports any other issue, ground faults, loss of power, door issues, etc, the crew must always fill out an MP 11.

The mechanical desk is now staffed 24 hours a day, seven days a week. They will be keeping reports of all issues reported to them. These reports will be cross-referenced with the MP 11 reports to ensure crews are in compliance with this requirement. If crews are found not to have submitted the MP -11 form as required, they will be subject to disciplinary procedures.

For your convenience, the MP-11 report has been digitized, and a link has been added to your tablet. Once you complete the MP-11, a copy will be sent to you, your union officials, and to the mechanical desk. Thank you for your attention to this matter.

9/12/2025

22.0 Summary of Interviews

The NTSB conducted interviews on September 26, 2025, September 27, 2025, and September 30, 2025.

For a full transcript please see the docket for this incident.²⁹

The interviews were as follows:

September 26, 2025

- Engineer 1
- Engineer Trainee
- Engineer 2
- Engineer 3
- Engineer 4
- Engineer 5

September 27, 2025

- Assistant General Manager Operations Division

September 30, 2025

- Director of Maintenance for Roberts Shop and OLP
- Assistant General Manager System Safety
- Senior Director of Railroad Operations

²⁹ The full interviews are in the docket: [NTSB Docket - Docket Management System](#)

J. SUBMITTED BY, AND CHIEF REVIEW

Submitted by:
Michael Bachmeier
NTSB Operations
/s/ November 2025

Todd Kraholik
NTSB Track & Operations
/s/ November 2025

Approved by:
Greg Scott
Branch Chief / RPH-120
/s/ November 2025

K. PARTIES TO THE INVESTIGATION - ACKNOWLEDGEMENT SIGNATURES

The undersigned designated **Party to the Investigation** representatives attest that the information contained in this factual report for NTSB’s accident investigation RRD25FR006 of the SEPTA Train 3223 fire and evacuation in Crum Lynne is a factually accurate representation of the information collected during the investigation, to the extent of their best knowledge and contribution in this investigation.

Brad Okoniewski, SEPTA	Date /s/ December 10, 2025
Josh Quillen, FRA	Date /s/ December 10, 2025
Lonnie Swigert, BLET	Date /s/ December 10, 2025
Gregory Moss, SMART-TD	Date /s/ December 10, 2025